

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JEREMY W. SCHULMAN,

Plaintiff,

v.

AXIS SURPLUS INSURANCE
COMPANY, ENDURANCE AMERICAN
SPECIALTY INSURANCE COMPANY,
and PROSIGHT SYNDICATE 1110 AT
LLOYD'S,

Defendants.

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CIVIL ACTION NO. 8:21-cv-1252-PWG

**DECLARATION OF JILLIAN M. RAINES IN FURTHER SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY JUDGMENT, AND COMBINED OPPOSITION
TO DEFENDANTS' CROSS-MOTION FOR SUMMARY JUDGMENT AND
DEFENDANT PROSIGHT'S MOTION FOR SUMMARY JUDGMENT ON
ISSUES SPECIFIC TO PROSIGHT**

Pursuant to 28 U.S.C. § 1476, I, Jillian M. Raines, hereby declare as follows:

1. I am a partner with the law firm Cohen Ziffer Frenchman & McKenna LLP, and counsel for Plaintiff Jeremy W. Schulman ("Plaintiff") in the above-referenced action. I have personal knowledge of the facts stated in this declaration, which I submit in support of Plaintiff's reply memorandum of law in further support of Plaintiff's Motion for Partial Summary Judgment, and combined opposition to Defendants' Cross-Motion for Summary Judgment and Defendant ProSight's Motion for Summary Judgment on Issues Specific to ProSight.

2. Attached as **Exhibit A** is a true and correct copy of "Akin Gump Invoices Through June 30, 2021," a summary compilation listing Akin Gump Strauss Hauer & Feld LLP invoices for services rendered through June 30, 2021, which was produced in this action bearing

Bates number SCHUL0000001.

Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
August 11, 2021

By: 
Jillian M. Raines (*Admitted pro hac vice*)

COHEN ZIFFER FRENCHMAN &
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served electronically on all counsel of record via operation of the Court's electronic filing system and by electronic mail on August 11, 2021.

/s/ Jeffrey M. Schwaber
Jeffrey M. Schwaber (Bar # 06095)

EXHIBIT A

AKIN GUMP INVOICES
THROUGH JUNE 30, 2021

Bill #	Date	Services Thru	Client	Matter	Client Name	Matter Name	Fees Billed	Disb Billed	Total Billed	Total AR	Payments Received from Insurers
1702041	5/26/2017	1/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 7,287.05	\$ -	\$ 7,287.05	\$ 2,186.11	\$ 5,100.94
1704634	5/26/2017	2/28/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 43,140.95	\$ 494.05	\$ 43,635.00	\$ 11,286.46	\$ 32,348.54
1716825	5/26/2017	3/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 27,156.70	\$ 278.57	\$ 27,435.27	\$ 8,230.59	\$ 19,204.68
1716828	5/25/2017	4/30/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 68,672.80	\$ 15.13	\$ 68,687.93	\$ 20,950.16	\$ 47,737.77
1720740	6/23/2017	5/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 174,107.25	\$ 195.78	\$ 174,303.03	\$ 52,232.17	\$ 122,070.86
1731045	9/6/2017	6/30/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 137,433.57	\$ 23,356.44	\$ 160,790.01	\$ 53,079.67	\$ 107,710.34
1731044	9/6/2017	7/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 12,516.69	\$ 215.10	\$ 12,731.79	\$ 3,819.54	\$ 8,912.25
1732509	9/29/2017	8/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 5,841.21	\$ -	\$ 5,841.21	\$ 1,752.36	\$ 4,088.85
1737587	12/6/2017	10/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 70,962.69	\$ 7,022.08	\$ 77,984.77	\$ 21,288.81	\$ 56,695.96
1748631	12/6/2017	11/30/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 33,578.84	\$ -	\$ 33,578.84	\$ 10,073.65	\$ 23,505.19
1754382	1/29/2018	12/31/2017	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 46,351.35	\$ 21,211.08	\$ 67,562.43	\$ 13,905.40	\$ 53,657.03
1756954	2/21/2018	1/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 25,720.00	\$ 184.26	\$ 25,904.26	\$ 7,716.00	\$ 18,188.26
1762736	3/16/2018	2/28/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 27,044.00	\$ 39.33	\$ 27,083.33	\$ 8,113.20	\$ 18,970.13
1766242	4/18/2018	3/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 39,285.00	\$ 105.17	\$ 39,390.17	\$ 11,762.64	\$ 27,627.53
1773709	5/24/2018	4/30/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 62,614.00	\$ 66.19	\$ 62,680.19	\$ 18,807.06	\$ 43,873.13
1776938	6/26/2018	5/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 63,880.00	\$ -	\$ 63,880.00	\$ 21,615.05	\$ 42,264.95
1783193	8/22/2018	6/30/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 58,363.50	\$ 2,646.18	\$ 61,009.68	\$ 17,885.05	\$ 43,124.63
1788108	8/22/2018	7/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 38,773.00	\$ 139.47	\$ 38,912.47	\$ 11,255.90	\$ 27,656.57
1790413	9/17/2018	8/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 13,940.50	\$ -	\$ 13,940.50	\$ 4,182.15	\$ 9,758.35
1794685	10/15/2018	9/30/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 6,032.50	\$ -	\$ 6,032.50	\$ 1,809.75	\$ 4,222.75
1803429	11/19/2018	10/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 23,459.00	\$ -	\$ 23,459.00	\$ 7,037.70	\$ 16,421.30
1805555	11/30/2018	11/30/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 588.50	\$ -	\$ 588.50	\$ 176.55	\$ 411.95
1811527	3/31/2019	12/31/2018	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 3,105.00	\$ 7.83	\$ 3,112.83	\$ 933.84	\$ 2,178.99
1815252	3/31/2019	1/31/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 2,463.00	\$ 0.47	\$ 2,463.47	\$ 739.04	\$ 1,724.43
1823158	3/31/2019	2/28/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 140.00	\$ -	\$ 140.00	\$ 42.00	\$ 98.00
1823949	4/10/2019	3/31/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 5,370.00	\$ 4,467.65	\$ 9,837.65	\$ 1,611.00	\$ 8,226.65
1834297	6/17/2019	5/31/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 4,667.50	\$ -	\$ 4,667.50	\$ 4,667.50	\$ -
1865388	9/1/2019	7/31/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 9,275.00	\$ -	\$ 9,275.00	\$ 2,554.30	\$ 6,720.70
1864726	12/16/2019	11/30/2019	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 990.00	\$ -	\$ 990.00	\$ 297.00	\$ 693.00
1872733	2/21/2020	1/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 2,447.00	\$ -	\$ 2,447.00	\$ 2,447.00	\$ -
1876053	3/16/2020	2/29/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 234.00	\$ -	\$ 234.00	\$ 234.00	\$ -
1880925	4/10/2020	3/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 2,051.00	\$ -	\$ 2,051.00	\$ 2,051.00	\$ -
1883989	5/7/2020	4/30/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 292.50	\$ -	\$ 292.50	\$ 292.50	\$ -
1889260	6/9/2020	5/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 212.00	\$ -	\$ 212.00	\$ 63.60	\$ 148.40
1897596	8/13/2020	7/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 591.50	\$ -	\$ 591.50	\$ 177.45	\$ 414.05
1907233	10/26/2020	9/30/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 55,743.00	\$ 139.58	\$ 55,882.58	\$ 55,882.58	\$ -
1911876	11/18/2020	10/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 109,559.50	\$ 65.29	\$ 109,624.79	\$ 109,624.79	\$ -
1926223	12/18/2020	11/30/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 40,288.00	\$ 188.80	\$ 40,476.80	\$ 40,476.80	\$ -
1926224	3/10/2021	12/31/2020	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 195,922.50	\$ -	\$ 195,922.50	\$ 195,922.50	\$ -
1933472	4/30/2021	1/31/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 227,513.50	\$ 1,858.49	\$ 229,371.99	\$ 229,371.99	\$ -
1933473	4/30/2021	2/28/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 220,499.50	\$ 362.76	\$ 220,862.26	\$ 220,862.26	\$ -
1933479	4/30/2021	3/31/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 183,233.00	\$ 71.88	\$ 183,304.88	\$ 183,304.88	\$ -
1938845	6/10/2021	4/30/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 174,934.50	\$ -	\$ 174,934.50	\$ 174,934.50	\$ -
1938846	6/10/2021	5/31/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 170,910.50	\$ -	\$ 170,910.50	\$ 170,910.50	\$ -
1942435	7/8/2021	6/30/2021	697903	1	JEREMY W. SCHULMAN	INVESTIGATION BY THE USDA FOR THE DISTRICT OF MARYLAND	\$ 165,925.00	\$ 1,828.37	\$ 167,753.37	\$ 167,753.37	\$ -
TOTALS							\$ 2,563,116.60	\$ 64,959.95	\$ 2,628,076.55	\$ 1,874,320.37	\$ 753,756.18